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13 Inc., d/b/a T3Leads, Grigor Demirchyan, and

14 Marina Demirchyan

15 UNITED STATES DISTRICT COURT
16 CENTRAL DISTRICT OF CALIFORNIA
17 WESTERN DIVISION

18 Consumer Financial Protection
19 Bureau,

20 Plaintiffs,

21 v.

22 D and D Marketing, Inc., d/b/a
23 T3Leads, Grigor Demirchyan, and
24 Marina Demirchyan,

25 Defendants.

Case No. 2:15-cv-09692-PSG(Ex)

STIPULATION TO EXTEND TIME
TO RESPOND TO INITIAL
COMPLAINT TO ALLOW FOR
PLAINTIFF TO AMEND
COMPLAINT; [PROPOSED] ORDER
(lodged herewith)

Complaint Served: March 10, 2016
Current Response Date: June 8, 2016
New Proposed Response Date: June
29, 2016

1 This Stipulation is entered into between Plaintiff the Consumer Financial
2 Protection Bureau (“Plaintiff”) and Defendants D and D Marketing, Inc., d/b/a T3Leads,
3 Grigor Demirchyan, and Marina Demirchyan (collectively, “Defendants”) with
4 reference to the following facts:

5 A. Plaintiff filed the Complaint in the above-captioned action (“Complaint”)
6 on December 17, 2015;

7 B. On March 10, 2016, Plaintiff served a notice of lawsuit and request for
8 waiver of service of summons for each of the Defendants on prior counsel for the
9 Defendants;

10 C. On March 15, 2016, Defendants returned executed waivers of service of
11 summons to Plaintiff, making their response to the Complaint due on or before May 9,
12 2016;

13 D. The parties previously agreed to an extension of Defendants’ time to
14 answer, move, or otherwise respond to the Complaint until June 8, 2016, and filed a
15 Stipulation with the Court pursuant to Local Rule 8-3 (Doc. No. 26);

16 E. The parties have met and conferred in accordance with Local Rule 7-3
17 regarding Defendants’ anticipated motion to dismiss pursuant to Federal Rule of Civil
18 Procedure 12(b)(6);

19 F. As a result of the parties’ meet and confer, Plaintiff intends to seek leave to
20 amend the Complaint;

21 G. Plaintiff needs additional time to prepare its amendment to the Complaint;

22 H. To conserve judicial resources and provide Plaintiff the additional time
23 needed to prepare its amended complaint, the parties have agreed to extend Defendants’
24 deadline to respond to the Complaint by an additional twenty-one (21) days, up to and
25 including June 29, 2016;

26 I. On or before June 29, 2016, the parties intend to file a stipulation
27 requesting that Plaintiff be granted leave to file an amended complaint (“Amended
28

Complaint”), in compliance with Local Rule 15 (“Stipulation for Leave to Amend the Complaint”); and

J. The parties agree that Defendants’ deadline to answer, move, or otherwise respond to the Amended Complaint (or the Complaint, if appropriate) will be thirty (30) days after the Stipulation for Leave to Amend the Complaint is approved or rejected by the Court.

NOW, THEREFORE, IT IS HEREBY STIPULATED by and between Plaintiff and Defendants, through their respective counsel, that:

- Defendants shall have up to and including June 29, 2016 to answer, move, or otherwise respond to the Complaint;
- On or before June 29, 2016, the parties will file a Stipulation for Leave to Amend the Complaint;
- Defendants shall have thirty (30) days after the Court approves or rejects the Stipulation for Leave to Amend the Complaint to answer, move, or otherwise respond to the Amended Complaint or the Complaint, if appropriate.

Dated: May 26, 2016

AKIN GUMP STRAUSS HAUER & FELD LLP

By /s/ Ashley Vinson Crawford

Ashley Vinson Crawford

Attorneys for Defendants D&D Marketing, Inc.,
d/b/a T3 Leads, Grigor Demirchyan, and Marina
Demirchyan

Dated: May 26, 2016

CONSUMER FINANCIAL PROTECTION
BUREAU

By /s/ Kara Miller

Kara Miller

Attorney for Plaintiff Consumer Financial
Protection Bureau

ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-4.3.1

I, Ashley Vinson Crawford, am the ECF User whose identification and password are being used to file this document. In compliance with Civil Local Rule 5-4.3.1, I hereby attest that all signatories have concurred in this filing.

Dated: May 26, 2016

AKIN GUMP STRAUSS HAUER & FELD LLP

By /s/ Ashley Vinson Crawford
Ashley Vinson Crawford
Attorneys for Defendants D&D Marketing, Inc.,
d/b/a T3 Leads, Grigor Demirchyan, and Marina
Demirchyan

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF CALIFORNIA

I am employed in the County of San Francisco, State of California. I am over the age of 18 and not a party to the within action; my business address is: 580 California Street, Suite 1500, San Francisco, CA 94104. On May 2, 2016, I served the foregoing document(s) described as: **STIPULATION TO EXTEND TIME TO RESPOND TO INITIAL COMPLAINT TO ALLOW FOR PLAINTIFF TO AMEND COMPLAINT** on the interested party(ies) below, using the following means:

All parties identified for Notice of Electronic Filing generated by the Court's CM/ECF system under the reference case caption and number

I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on May 26, 2016 at San Francisco, California.


Suzanne G. Martinson